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April 11, 2022

**VIA ELECTRONIC FILING**

The Hon. Leda Dunn Wettre  
U.S. District Court  
Martin Luther King Federal Bldg. & Courthouse  
50 Walnut Street, MLK 3C  
Newark, NJ 07102

**Re: *Barron, et al. vs. State of New Jersey, et al.***  
**Case No: 2:17-cv-00735-JM-MF**

Dear Judge Wettre:

Plaintiff is in receipt of the Court's Amended Scheduling Order of April 6, 2022. Counsel wishes to offer an objection, based on the entire history of the case and the inability to meet the shortened deadlines imposed by the Court requiring fact discovery to be completed in less than two (2) months with only 30 days thereafter for an expert report. The expert will be required to review over 30 transcripts, thousands of pages of discovery, and various pleadings and written discovery responses. Plaintiff did set out a schedule taking the case through the end of the year to be completed, but the Court shortened the period to August 31, 2022 noting no further extensions will be granted.

There was a year and a half period after several discovery disputes were resolved where the state troopers could not appear for deposition due to the pandemic. There was a recent change of defense counsel requiring time to evaluate and get up to speed on the case.

Regarding mediation, it is noted that Plaintiffs accepted Judge Falk's recommendation despite our position that the recommendation was low – to be met with silence by the defense who did not offer a dime more than at the settlement conference of September 23, 2021 yet agreed to further mediation, at cost and expense to all parties. Plaintiffs do not argue with any party's decision not to settle a case; that is not the issue. However, the anticipation of a good faith mediation and consideration of savings in costs and legal time led to a decision to hold continued discovery pending the mediation. Now it is the plaintiffs who are being penalized, as is it plaintiffs who needs the proofs to establish liability and be ready for trial.

Plaintiff will get this case back on track immediately and schedule depositions. We anticipate that if the Court sees that the case is moving expeditiously that we will be able to present further argument on the time required for expert discovery

Very truly yours,

A handwritten signature in blue ink, appearing to read "Shelley L. Stangler".

SHELLEY L. STANGLER, ESQ.

SLS/mf

cc: Victor DiFrancesco, DAG  
Peter Draper, DAG  
Corinne Mullin, Esq